



FCC Introduction

October 20, 2016

Agenda

- Ghostery Introduction
- Our thoughts on the FCC Proposed Rulemaking
 - Web Browsing History – Sensitive information or not?
 - IP Address – PII?

About Me



- Chief Executive Officer, Co-Founder



- President and CEO



- VP & General Manager, NYTimes.com



- VP & General Manager, B2C



- Early career

Millions Of Consumers Rely On Ghostery To Control How They Are Tracked Online

The image shows a screenshot of the Sears website. The top navigation bar includes links for Store Locator, Gift Cards, Gift Ideas, Credit Card, Kmart.com, My Orders, and Help. The main navigation bar lists various product categories: Appliances, Auto, Baby, Clothing, Electronics, Fitness, Home, Jewelry, Outdoor, and Parts. A large promotional banner for Craftsman tools is visible, featuring the text "Get More Done for Less" and "Save 50% on featured Craftsman tools".

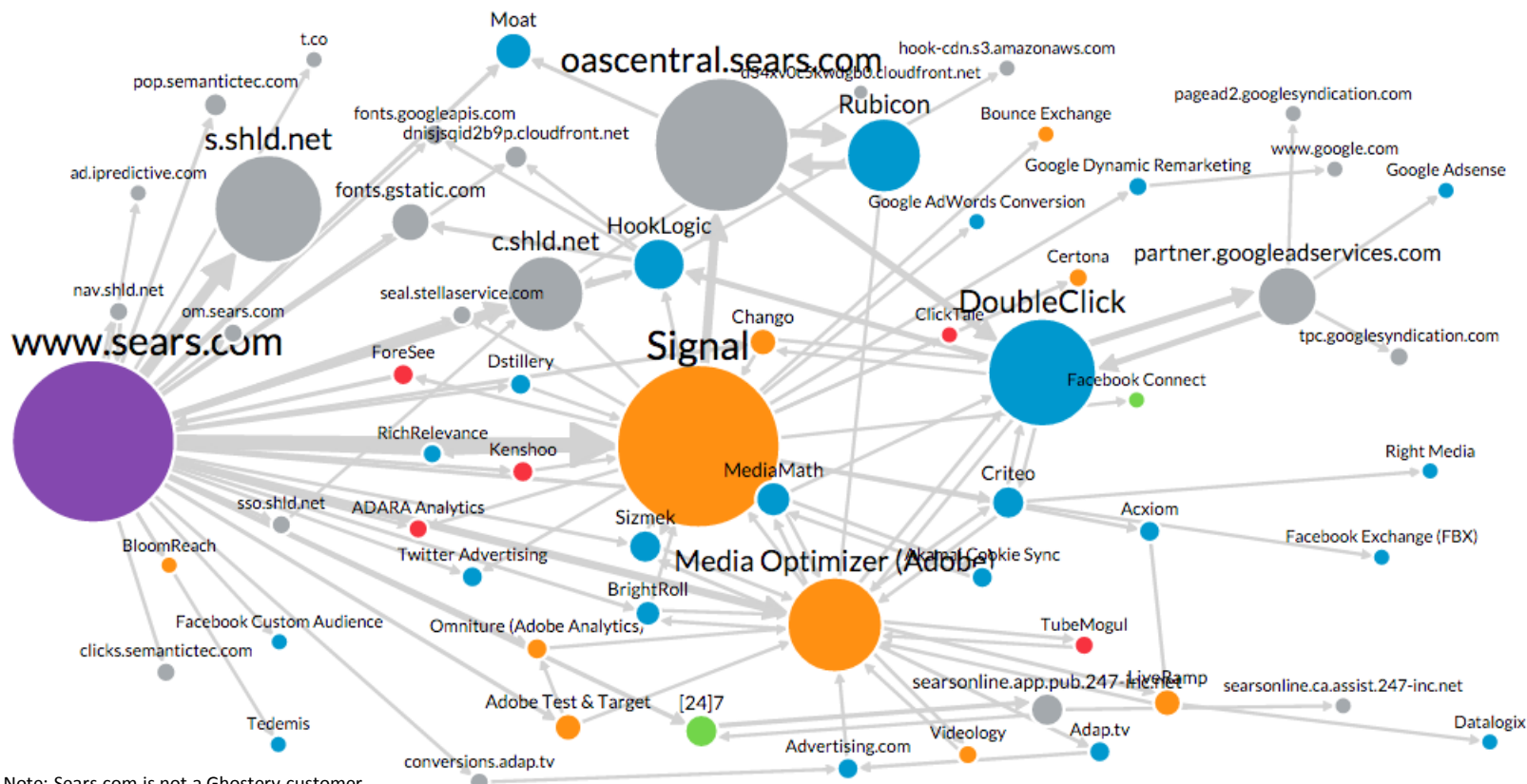
Overlaid on the right side of the image is the Ghostery extension interface. It displays a "Tracker Summary" with a "Trust Site" button and a "Restrict Site" button. A circular progress indicator shows "68 Trackers". Below this, a table lists categories of trackers, their allowed status, and blocked status.

CATEGORIES	ALLOWED	BLOCKED
Advertising	62	0
Customer Interaction	1	0
Essential	3	0
Site Analytics	1	0
Social Media	1	0

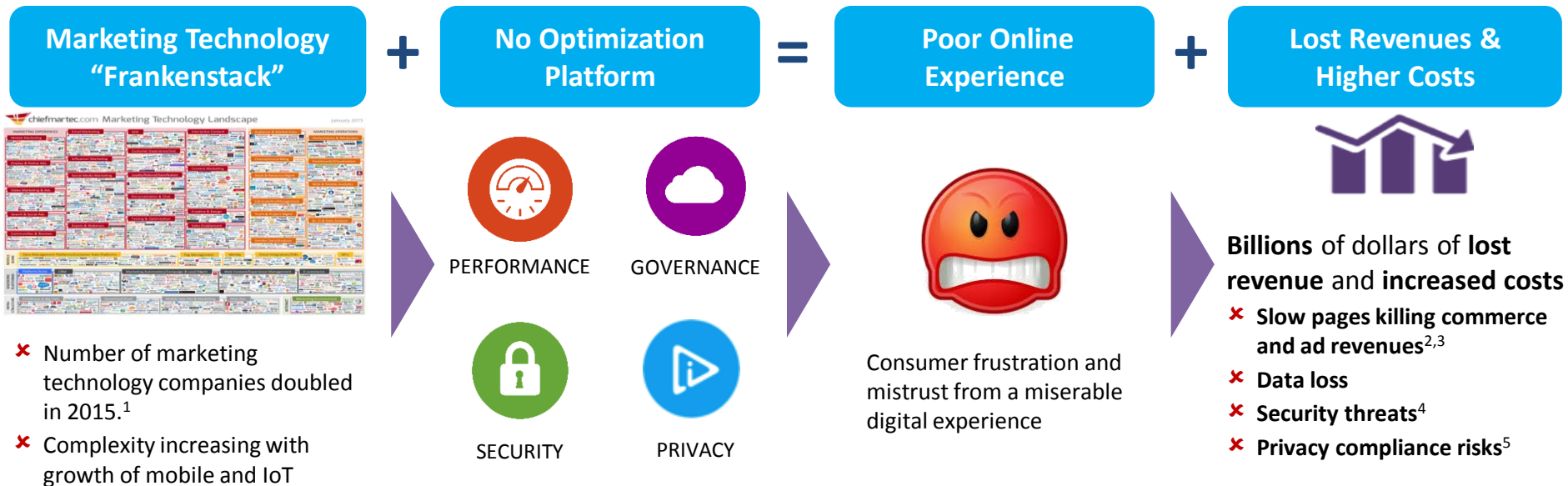
At the bottom right of the Ghostery overlay is a "Share" button with a share icon.

Businesses Rely On Ghostery To Optimize The Digital User Experience, Driving Revenues And Profits

Ghostery Tracker Map™



The Problem: “Frankenstack” Ruins Consumer Experience, Losing Billions in Online Revenue



Source: (1) ChiefMarTec.com. (2) Amazon internal study 2013. (3) Radware internal study 2014. (4) Ponemon Institute & Ghostery Mixed Content Warnings Study – September 2014. (5) European Global Data Protection Regulation.

Ghostery Overview

Founded in 2009, Ghostery empowers consumers and businesses to create safer, faster, and more trusted digital experiences



SECURITY



GOVERNANCE



PERFORMANCE



PRIVACY



MCM

Ghostery
Plug-In

App Choices

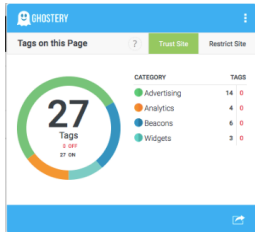
App Notice

Site Notice

Ad Choices

Ghostery Business Model Overview

Proprietary Data



Real user data from millions of global opt-in contributors



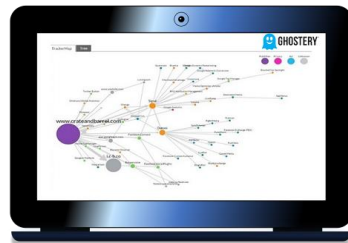
Library of 2,000+ Marketing Technology Vendors globally. Curated and regularly updated



Ghostery Proprietary Database

Patented web analytics technology and IP portfolio

Business Solutions



4.8 billion tag loads analyzed across 87 million pages weekly



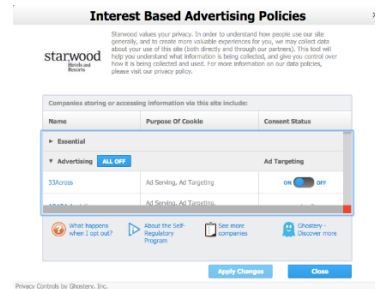
Compliance technology powering 3+ billion ads daily for 300+ clients in 40 languages. Opt-out lab powers enforcement of Ad Choices program

Market Share Leader in Privacy Compliance Across All Devices

Behaviorally-Targeted Ads Bought & Sold Across Desktop, Mobile Web and In-App



Compliance for Data Collection on Sites and Apps



How Web Browsing History Is Used In Advertising – The Same For ISPs as Any Other Company. Not Combined With Personal Data By Default



When a person visits a website, searches, or starts a shopping cart online...

http://info.evidon.com/about_behavioral_advertising/section1

How Web Browsing History Is Used In Advertising – The Same For ISPs as Any Other Company. Not Combined With Personal Data By Default



companies identify his/her browser, along with inferences about their interests, by placing small text files (e.g. cookies) on their computer.

http://info.evidon.com/about_behavioral_advertising/section1

How Web Browsing History Is Used In Advertising – The Same For ISPs as Any Other Company. Not Combined With Personal Data By Default

Data Aggregators: create audience segments for advertisers to target.

Data Aggregators combine data from multiple sources and create audience groups, or "segments," based on particular characteristics like interests, demographics and more (for example, "Paris Travelers").

NAVIGATE:

Ad Servers

Agencies

Ad Networks

Exchanges

Data Aggregators

Demand-Side
Platforms (DSP)



http://info.evidon.com/about_behavioral_advertising/section2

How Web Browsing History Is Used In Advertising – The Same For ISPs as Any Other Company. Not Combined With Personal Data By Default

What happens with a person's data?

- Cookies , beacons , and flash cookies are used to collect it.
- Data collected is generally used to include a person's browser in an audience segment.
- Cookies are used for other things too; enabling them on a computer can make navigating the web easier.
- Some companies collect data and sell it to other companies; being familiar with company privacy policies helps people protect their privacy.
- Opting out of interest-based advertising doesn't mean people stop receiving ads.
- In certain cases, data may be combined with other sources (or with personal information on an opt-in basis) to produce more detailed profiles.

http://info.evidon.com/about_behavioral_advertising/section3

Agenda

- Ghostery Introduction
- Our thoughts on the FCC Proposed Rulemaking
 - Web Browsing History – Sensitive information or not?
 - IP Address – PII?

ISPs And Publishers Collect The Same Web Browsing History, So The Privacy Controls Should Be The Same (I)

Control your Google ads

You can control the ads that are delivered to you based on your Google Account, across devices, by editing these settings. These ads are more likely to be useful and relevant to you.

Your topics

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> American Football | <input checked="" type="checkbox"/> Arts & Entertainment | <input checked="" type="checkbox"/> Bollywood & South Asian Film |
| <input checked="" type="checkbox"/> Business & Industrial | <input checked="" type="checkbox"/> Celebrities & Entertainment News | <input checked="" type="checkbox"/> Classical Music |
| <input checked="" type="checkbox"/> Computers & Electronics | <input checked="" type="checkbox"/> Dance & Electronic Music | <input checked="" type="checkbox"/> Movies |
| <input checked="" type="checkbox"/> Parenting | <input checked="" type="checkbox"/> Performing Arts | <input checked="" type="checkbox"/> Politics |
| <input checked="" type="checkbox"/> Pop Music | <input checked="" type="checkbox"/> Rock Music | <input checked="" type="checkbox"/> Shopping |
| <input checked="" type="checkbox"/> TV & Video | <input checked="" type="checkbox"/> TV Comedies | <input checked="" type="checkbox"/> TV Documentary & Nonfiction |
| <input checked="" type="checkbox"/> TV Dramas | <input checked="" type="checkbox"/> TV Sci-Fi & Fantasy Shows | |

+ NEW TOPIC

WHERE DID THESE COME FROM?

Your profile

This information comes from your Google Account. If you edit it, your changes will apply across your Google Account. Depending on the settings you've chosen, this information might be used to show you ads.

Gender: Male 

Age: Unknown 

Ads based on your interests

Improve your ad experience when you are signed in to Google sites



With Ads based on your interests ON

- The ads you see will be delivered based on your prior search queries, the videos you've watched on YouTube, as well as other information associated with your account, such as your age range or gender
- On some Google sites like YouTube, you will see ads related to your interests, which you can edit at any time by visiting this page
- You can block some ads that you don't want to see

With Ads based on your interests OFF

- You will still see ads and they may be based on your general location (such as city or state)
- Ads will not be based on data Google has associated with your Google Account, and so may be less relevant
- You will no longer be able to edit your interests
- All the advertising interests associated with your Google Account will be deleted

Control ads on 2 million+ websites

You can opt-out of and control more ads, such as:

- ads shown anonymously to this browser by Google
- ads shown to you on non-Google sites
- ads that use information from your visits to advertiser websites
- ads shown to you on Google sites when you are not signed in

CONTROL SIGNED OUT ADS



Visit the [Consumer Ads Help Center](#) to learn more about how Google serves ads.

<https://www.google.com/settings/u/0/ads/authenticated>

ISPs And Publishers Collect The Same Web Browsing History, So The Privacy Controls Should Be The Same (II)

[Privacy Main](#) [Privacy FAQ](#) [Preferences](#) [Terms of Service](#) [Help](#)

AOL Privacy Policy Highlights

We are committed to building, improving, and expanding some of the best brands online – or anywhere, for that matter. You can find out about our brands such as The Huffington Post, MapQuest, Engadget, AOL Advertising and [more](#).

AOL is now part of the Verizon family of companies. Additional privacy practices are described in the [Verizon Privacy Policy](#). In the event of a conflict between this Privacy Policy and the Verizon Privacy Policy, the AOL Privacy Policy will control when you are on an AOL site or using an AOL product or service.

This notice provides highlights of the full [privacy policy](#) which currently applies to the collection and use of information from any device used to access or connect to AOL branded websites, services, and software, as well as many websites owned by or affiliated with AOL and operating under different names. Para leer este documento en español haz clic [aquí](#).

What's New

- The [AOL Privacy Policy](#) was updated effective 9/29/2016.
- Updated information related to [International Users](#).
- Updated information related to your [Mobile Choices](#).

Internet Advertising

Our ability to provide free content and services depends on advertising. Some of our ads are displayed based on the page visited, but many of our ads are targeted to you based on your interests and other information we have about you. We want you to understand how internet advertising works and offer resources and choices. [Learn more](#).

Information Sharing

AOL may share your personal information in limited circumstances, including when we have your consent to do so or when sharing is necessary to protect AOL or comply with the law. Our agents and contractors may have access to your information, but only to perform services for AOL. We do not sell or rent your personal information to third parties. We may, however, share [non-personally identifiable](#) information with select business partners.

How to Opt-Out

You can [opt-out](#) of targeted advertising delivered by the AOL Advertising Network.

Information We Collect and Receive

We collect and receive information about you and your device when you give it to us directly, when you use our Services, and from certain third-party sources.

Your Choices

- You can [opt-out](#) of the use of your data for interest-based advertising.
- We offer [Marketing Preferences](#) to control how we communicate offers to you.
- You can control the collection and use of [search information](#).
- Registered users can manage their accounts at [My Account](#).
- You can view your [interest-based segments](#).
- You can manage cookies using [browser controls](#).
- Individual products or services may offer additional controls or preferences.

How we use your Information

The information we collect and receive is used to provide our Services, to improve our Services, and to offer effective advertising, which helps us keep most of our Services free.

How to Contact Us

AOL Privacy
22000 AOL Way
Dulles, VA 20166
privacyquestions@aol.com



AOL is a member of the Network Advertising Initiative and is committed to complying with the Digital Advertising Alliance (DAA) Self-Regulatory Principles for Online Behavioral Advertising.

<http://privacy.aol.com/>

Summary of Ghostery's Perspective

- Web Browsing data is collected the same way, regardless of whether the company is an ISP or a Publisher, Social Network, Retailer, etc. The consumer controls, therefore, should work the same way.
 - This is the widely accepted FTC and DAA regime
 - That ISPs can only use intrusive methods like Deep Packet Inspection to segment out use of personal/sensitive information is false
- IP Address should not constitute “PII”. This is essentially “throwing out the baby with the bathwater”
 - IP address is where the computer connects to the internet. It does not identify the computer, nor the person itself. Therefore it does not actually contain PII unless correlated with other data sets
 - IP address, per industry standards, is **never** correlated in this way to identify an individual for advertising purposes unless the user has opted-in. This is auditable by FCC and other regulators and has been standard industry practice for many years



THANK YOU

Scott Meyer
scott@ghostery.com